

**IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF PENNSYLVANIA**

THOMAS DEXTER JAKES,

vs.

DUANE YOUNGBLOOD,  
JOHN DOE 1,  
JOHN DOE 2,  
JOHN DOE 3,  
JOHN DOE 4,  
JOHN DOE 5,  
JOHN DOE 6,  
JOHN DOE 7,  
JOHN DOE 8,  
JOHN DOE 9, and  
JOHN DOE 10,

Defendants.

Case No. 2:24-CV-1608-WSS

**AFFIDAVIT OF JERMAINE JAKES  
IN SUPPORT OF PLAINTIFF'S  
OPPOSITION TO MOTION TO  
DISMISS**

**JERMAINE JAKES**, being duly sworn, states as follows:

1. T.D. Jakes is my father, I am his second eldest child. I live in Dallas, Texas. I write this affidavit in support of my father's lawsuit against Duane Youngblood and those with whom Duane coordinated to smear my father in the podcasts titled "10.28.2024 - Larry Reid Live INTERVIEWS Duane Youngblood: 'The Abused become the Abuser,'" and "11.3.24 – Pt. 2 – Larry Reid Live INTERVIEWS Duane Youngblood: 'The Abused became The Abuser.'"

2. On the afternoon of November 3, 2024, I was looking at my social media feed and noticed an advertisement promoted by the Larry Reid Live show/podcast for an interview with Duane Youngblood labeled "The Abused becomes The Abuser."

3. I was immediately concerned that Duane Youngblood might be putting himself in harm's way unknowingly by involving himself with Larry Reid. Based on my personal

experience, Larry Reid's podcasts create controversy that can be very destructive to people's lives. Certainly, such has been my experience with Reid's podcasts targeting and attacking my father over a period of years.

4. That is the context in which on November 3, 2024 I sent a message to Duane Youngblood – it was a cautionary warning to someone I know – Duane – to avoid Larry because my experience is that Larry Reid distorts facts and is not truthful.

5. I had not talked to or seen Duane in over 30 years. However, I know Duane from growing up in West Virginia. Our families were part of the same church community and Duane's brother, Richard Youngblood, was my youth minister.

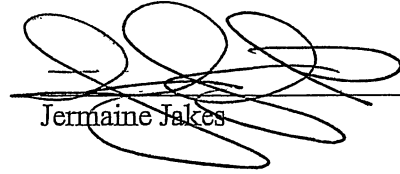
6. When I sent the message to Duane, I had not seen the podcast. So, I did not know what had been stated or that my father was the focus of the discussion. There was no reason for me to say anything that I intended or meant to be threatening.

7. Duane responded to my message practically immediately stating that he received the message and "it was noted."

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I declare under penalty of perjury that the foregoing is true and correct.

DATED: February 14, 2025

  
Jermaine Jakes

Sworn to me before this 14<sup>th</sup> day of February 2025.

  
Notary Public

